

# Melon Research Board

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(2PP)

Joseph Hogue  
Field and External Affairs Division (7506C)  
Office of Pesticide Programs, EPA

May 4, 2003

Dear Mr. Hogue,

Please accept the following comments submitted by the California Melon Research Advisory Board (CMRAB) for Docket ID No. OPP-2002-0231. The CMRAB supports the proposed revisions identified in the Federal Register notice of April 24, 2003 regarding Section 18 labeling of pesticides. The proposed changes to the registration process are both welcome and indeed very necessary steps that need to be implemented as soon as possible.

The first proposed change to allow individual states to renew Section 18 labels would be very beneficial for pest problems that occur on an annual basis. Any help in reducing or even eliminating the paperwork and time involved by industry members to renew a Section 18 from one year to another is a very welcome change. When a new pest problem arises, it usually occurs for multiple years in a given crop. Management of a new pest problem rarely, if ever, can be effectively brought into crop production in a single season. Therefore, the renewal process could, and should, be looked upon as an easier step in assisting growers and their Pest Control Advisers (PCAs) in getting the necessary tools in place to manage a pest beyond a single season. The CMRAB urges that EPA immediately include all compounds into the pilot program and not restrict the materials to just reduced-risk pesticides. The urgency of needing to allow all pesticides requested for a Section 18 into the pilot program goes along with the urgency of an emergency labeling for a serious pest problem. Growers can not incur significant crop losses while EPA just allows reduced-risk materials into their pilot program. Please be aggressive in administering these needed changes in the Section 18 process and allow all materials that are requested by industry into the pilot program. This will allow more events to be evaluated in the review process for the pilot program.

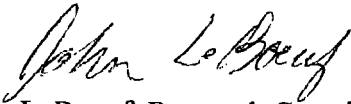
The second proposed change to make it easier to prove significant economic losses with field data is also welcome when growers encounter new pests. The CMRAB supports changing the criteria needed to establish that an economic loss occurred by industry members. Even if only some of the growers have incurred losses of greater than 20%, such as in a single growing region in the state, or by individual growers who use varying irrigation techniques such as drip, furrow, or dryland farming due to low water tables, if any growers can show significant losses because of a new pest then the data should be accepted for use in the Section 18. Data should not have to meet entire industry revenue or yield data to qualify as pests rarely impact on the entire melon

industry in California. Some growers can use ground rig applicators while other growers are forced to use aerial applicators for their pesticide applications. The melon industry in California has many variations used in crop production and therefore field specific data should be allowed to establish that an economic loss has occurred without meeting the identified levels of historical gross revenues or yield as outlined by EPA.

The third topic identified for revisions is resistance management. The CMRAB supports changes in this area too to make Section 18 requests easier to process. Widespread resistance to a pesticide should not be the criteria to use in determining a need for a Section 18. Resistance is a concern of the agricultural manufacturers, and growers and PCAs too, so this important topic belongs in the toolbox of Integrated Pest Management. If individual PCAs can identify a problem, and an industry researcher confirm the pest resistance, then this revision should be allowed to be used in the Section 18 process. Having a university researcher that works with industry has been very beneficial in the past and can be expanded upon during times of crisis when a Section 18 is requested. Crop management for melons involves a team effort from growers, crop advisers, agricultural manufactures, packers and shippers, and researchers too. The EPA can become an effective part of this team effort by making the proposed changes and revisions outlined in this letter and incorporating them into the pilot program for 2003.

Thanks you for the opportunity to share the concerns and requests of the cantaloupe, honeydew, and mixed melon industries in California.

Sincerely,



John LeBoeuf, Research Coordinator  
California Melon Research Board

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cc: Dan Rosenblatt, Rick Keigwin

2/2